

SBC
EmPAC

SBC Communications Inc.
Employee Federal Political Action Committee

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FEDERAL ELECTION COMMISSION

2002 JUN 26 12 24 PM

June 24, 2002

Ms. Antoinette Kitchen
Senior Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Identification Number: 000109017

Reference: February Monthly Report (1/1/02-1/31/02)

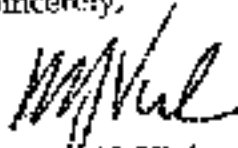
Dear Ms. Kitchen:

SBC EmPAC became aware of FEC Advisory Opinion 1996-29 pertaining to in-kind contributions upon receipt of your May 15, 2002 correspondence. Your correspondence stated that in-kind contributions for food and refreshments in connection with fundraising events for federal candidates were not considered to have a "long-term useful life" and could only be designated to the current election period.

Please be advised that SBC EmPAC made an in-kind contribution on behalf of Rep. Spencer Bachus, which was designated for the general election but made before the primary election, on January 6, 2002 and was reported in the February Monthly Report (1/1/02-1/31/02). SBC EmPAC has taken corrective action. A letter requesting a refund of this contribution was sent to the recipient campaign committee on June 20, 2002. Consistent with FEC reporting requirements, a future monthly filing will report our receipt of this refunded contribution.

Please let me know if you require further information or have additional questions.

Sincerely,



Michael J. Viola
Treasurer, SBC EmPAC